



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Rulemaking 06-04-009
(Filed April 13, 2006)

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October 18, 2006

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework
and to Examine the Integration of Greenhouse Gas
Emissions Standards into Procurement Policies.

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Rulemaking 06-04-009
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**JOINT COMMENTS OF THE
CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION, NORTHERN
CALIFORNIA POWER AGENCY, AND THE SOUTHERN CALIFORNIA PUBLIC
POWER AUTHORITY ON THE INTERIM EMISSIONS PERFORMANCE
STANDARD FINAL WORKSHOP REPORT**

In accordance with the *Assigned Commissioner's Ruling: Phase 1 Amended Scoping Memo and Request for Comments on Final Staff Recommendations*, filed October 5, 2006, in Rulemaking R.06-04-009 ("Rulemaking"), and pursuant to the Rules of Practice and Procedure of the Public Utilities Commission ("CPUC" or "Commission") of the State of California, the California Municipal Utilities Association ("CMUA"),¹ Northern California Power Agency ("NCPA"),² and the Southern California Public Power Authority ("SCPPA")³ hereby file these Joint Comments on the *Final Workshop Report: Interim Emissions*

¹ CMUA is an association representing publicly owned electric utilities including 38 electric distribution utilities and 3 joint powers agencies.

² NCPA is a California Joint Action Agency comprising 18 municipalities, rural electric cooperatives, irrigation districts and other publicly owned entities interested in the purchase, aggregation, scheduling and management of electrical energy.

³ SCPPA is a California governmental entity created pursuant to the California Joint Exercise of Powers Act found in Chapter 5 of Division 7 of Title 1 of the California Government Code (California Government Code section 6500 et. seq.). SCPPA is a joint action public agency whose members consist of eleven California municipalities and an irrigation district which supply electrical energy, for the purpose of jointly and cooperatively undertaking planning, financing, development, acquisition, construction, operation, maintenance and repair of projects for the generation or transmission of electric energy. A substantial number of SCPPA's members have expressed concern with respect to Senate Bill 1368 and the proposal to create the performance standards which are under consideration in this workshop. Because of the recent passage of Senate Bill 1368, not all SCPPA member city councils have yet been able to fully develop their position or address all the ramifications created by the proposed performance standards or by Senate Bill 1368.

Performance Standard Program Framework (“Report”), filed October 2, 2006, and the staff proposal contained in section VI.C of the Report (“Staff Proposal”).

I. Introduction And Scope Of Opening Comments

CMUA, NCPA, and SCPPA represent and are comprised of California’s publicly owned electric utilities (“POUs”) serving approximately one-quarter of the electricity load in the state. These POUs are not jurisdictional to the CPUC, accordingly, the Staff Proposals for an interim greenhouse gas (“GHG”) Emission Performance Standard (“EPS”) would not apply directly to POUs.⁴

This important jurisdictional distinction is recognized by Senate Bill (“SB”) 1368,⁵ which in newly added Public Utilities Code section 8341(a), proscribes certain actions “unless any baseload generation supplied under the long-term financial commitment complies with the greenhouse gases emission performance standard established by the [CPUC], pursuant to subdivision (d), for a load-serving entity, or by the Energy Commission, pursuant to subdivision (e), for a local publicly owned electric utility.” SB 1368 defines a load-serving entity to mean “every electrical corporation, electric service provider, or community choice aggregator serving end-use customers in the state”⁶ and a local publicly owned electric utility to mean a “local publicly owned electric utility” as defined in [Public Utilities Code] Section 9604.⁷

As it currently stands, SB 1368 requires that the CPUC implement an EPS for load-serving entities in a very short time frame. The California Energy Commission (“CEC”) is given approximately 5 months longer, which in terms of new regulatory actions, is definitely placed on the fast track. In regard to one aspect of the EPS, SB 1368 states that the “Energy Commission *may*, in order to ensure compliance with the greenhouse gases emission performance standard by local publicly owned electric utilities, apply the procedures adopted by the [CPUC] to *verify the emissions of greenhouse gases* from baseload generation pursuant

⁴ Report at 13.

⁵ Stats. 2006, Chapter 598 (September 29, 2006).

⁶ Public Utilities Code section 8340(h) (added by Chapter 598).

⁷ Public Utilities Code section 8340(i) (added by Chapter 598).

to subdivision (b).”⁸ This authority is very narrow indeed, and SB 1368 neither compels the CEC to follow the CPUC procedures for verification, nor proposes that the CEC follow the CPUC procedures in any other area. Both because this CPUC rulemaking is scheduled to move quickly, and because of the potential interaction between the CPUC and CEC implementation measures, the Joint Commenters are responding in this venue to ensure that all decisions and implementation matters are addressed with all relevant information before the Commission.

Lastly, although the POU’s are not subject to CPUC jurisdiction, the Joint Commenters intend to participate in this rulemaking on a collaborative basis to assist in the development of a standard that serves the interests of all Californians. The Joint Commenters also plan to participate in the CEC process, which is likely to be initiated during a CEC regular business meeting in which the CEC will entertain approval of an Order Instituting Rulemaking to adopt regulations pursuant to SB 1368.

II. California’s POU’s Have Pledged To Work Collaboratively With The CEC And Are Currently Acting To Reduce Greenhouse Gas Emissions While Maintaining Resource Adequacy

Prior to the passage of SB 1368, the Joint Commenters had already stated their intention through CMUA, to collaborate with the CEC and establish programs for achieving GHG emission reductions that are real, permanent, quantifiable, verifiable, and enforceable. On June 6, 2006, the CMUA Board of Governor’s passed a Resolution pledging to support state goals for reducing GHG emissions. This policy, included below in its entirety, effectively articulates the position of the Joint Commenters and is relevant to their participation in this rulemaking.

California’s publicly owned electric utilities have a long history of environmental stewardship, investment in renewable technologies, and commitment to energy efficiency. As not-for-profit utilities regulated by local elected officials and ultimately responsible to their customer/owners, they are motivated by providing value to, and responding to the goals of, the

⁸ Public Utilities Code section 8341(c)(2) (added by Chapter 598)(emphasis added). The reference to “subdivision (b)” in Section 8341(c)(2) refers to Public Utilities Code section 8341(b)(3) which states that the CPUC “shall adopt procedures, for all load-serving entities, to verify the emissions of greenhouse gases from any baseload generation supplied under a contract subject to the greenhouse gases emission performance standard to ensure compliance with the standard.”

community they serve. Publicly owned utilities have been in the forefront of the development of solar energy, wind energy, fuel cells, and energy efficiency. During California's ill-fated electric restructuring exercise, California's publicly owned utilities continued to meet their obligation to serve. Today, they remain vertically integrated entities, planning for the load they serve and investing in energy efficiency and a diverse resource mix to serve that load.

California's publicly owned utilities recognize the necessity of reducing greenhouse gas (GHG) emissions in accord with state policies while maintaining reliability of electric service, public safety, and economic energy prices. They look forward to working collaboratively with both the state and federal governments to develop and implement greenhouse gas reduction programs that involve all sectors of the economy that contribute to greenhouse gas emissions.

PRINCIPLES

Therefore, the Board of Governors of the California Municipal Utilities Association (CMUA), representing the State's publicly owned electric utilities agree to the following principles and further agree to recommend the adoption of these principles by the governing boards and councils of local publicly owned electric utilities.

1. Each utility will develop a greenhouse gases reduction plan, consistent with the State's reduction goals, adopted by its elected governing board in public hearings, and provided to the California Energy Commission when adopted and whenever updated. Smaller utilities may choose to aggregate their plans into a single, larger plan. Each utility will explore the impact of a "sustainable portfolio" to allow the utility to meet its overall load-based greenhouse gas reduction goals by balancing investments in renewable energy, energy efficiency and demand reduction, carbon trading, carbon emissions mitigation, and/or through other innovative ways. In the design of programs to reduce greenhouse gases emissions, each utility supports the concept of receiving credit for early action to reduce greenhouse gases emissions.
2. As a means of meeting greenhouse gases reduction goals, each utility will proactively implement state law, which requires that "... each publicly owned electric utility, in procuring energy, shall first acquire all available energy efficiency and demand reduction resources that are cost-effective, reliable, and feasible." Such investment in cost-effective energy efficiency and demand reduction resources will not be limited to public benefits funds and allocations.
3. As a means of meeting greenhouse gases reduction goals and meeting energy needs after implementing point 2 above, each utility will first pursue renewable energy supplies, and second, other non greenhouse gas

emitting resources and clean fossil resources:

- a. In considering renewable resources in competition with fossil fuel resources each utility will quantify the financial risk of greenhouse gas producing resources in their planning and procurement process, including but not limited to a quantified carbon emissions risk adder for both in-state and out-of-state resources.
 - b. Each utility will continue to aggressively pursue its renewable energy supply in accordance with its renewable portfolio standard (RPS), pursuant to Public Utilities Code section 387.
 - c. Each utility will facilitate distributed generation/combined heat and power (DG/CHP) projects that reduce greenhouse gases emissions in their service territory by evaluating transmission and distribution benefits and providing equitable methods for the DG/CHP owner to sell excess electricity to the host utility.
 - d. Each utility will consider environmental justice issues in its overall resource procurement and greenhouse gas reduction policies.
4. Each utility will support standardized, mandatory greenhouse gases reporting from all significant sources. Smaller utilities may choose to aggregate their greenhouse gases emissions.
 5. Each utility will provide measurement and verification programs that reduce greenhouse emissions.
 6. Each utility will provide education for its customers on ways that they can reduce their greenhouse gas emissions, and provide assistance where feasible. Any utility that provides financial assistance shall receive credit for appropriate share of the reduction toward that utility's goals.

IMMEDIATE ACTIONS

The CMUA Board of Governors recommends that all electric utility members initiate the following actions immediately:

1. Obtain governing board or council adoption of these principles.²
2. Schedule a joint planning session with the California Energy Commission regarding the implementation of these principles.

LONG TERM ACTIONS

The CMUA members will initiate the detailed actions necessary to implement the principles approved by their governing board or council.

² The list of entities that have already adopted these principles includes at least Alameda, Azusa, Biggs, Burbank, Gridley, Healdsburg, Lompoc, Los Angeles, Modesto, NCPA, Palo Alto, Plumas-Sierra REC, Port of Oakland, Roseville, SMUD, Shasta Lake, Santa Clara, and Trinity PUD.

III. Specific Comments On Workshop Report At Pages 76-77: Monitoring and Enforcement

The Joint Commenters do not dispute the CPUC's jurisdiction over load-serving entities, or the CPUC's responsibility with regard to implementing SB 1368 for those load-serving entities. However, the Joint Commenters note the Report's acknowledgement, based on its summary of comments made by various parties on the Draft Workshop Report, of the difference between IOUs and non-IOU load-serving entities. From reading these extracts, the Report clearly demonstrates a cognizance of the fact that certain load-serving entities must be treated differently in terms of monitoring and compliance.

NRDC/TURN/UCS/WRA: "ESPs operate fundamentally differently from the IOUs. Their procurement plans and transactions are not subject to the requirements of AB 57, therefore EPS compliance monitoring for ESPs must be conducted differently than that for the IOUs. The Revised Staff Proposal appears to present conflicting statements with respect to how ESP compliance with the EPS will be determined. EPS monitoring and compliance fails to reflect important distinctions between ESP and IOU compliance."¹⁰

Constellation: "... in addition to the fact that the AB 57 procurement process is not applicable to ESPs, there should be no requirement under the EPS that ESPs seek Commission pre-approval of covered contracts. Instead, Constellation suggests that ESPs address whether or not they secured capacity or energy from covered contracts within the regular compliance filings made annually and monthly in the resource adequacy effort. Such an approach would provide a simple, administratively efficient and timely means of informing the Commission of EPS compliance."¹¹

AReM: "Importantly, AReM's proposal [that if an ESP enters into a contract, it would provide the CPUC with the information necessary to verify that the contract is in compliance with or exempt from the EPS] is consistent with SB 1368. While this legislation expressly requires the IOUs to submit proposed contracts to the Commission for pre-approval, it does *not* require non-IOU LSEs (e.g., ESPs and CCAs) to do so. Since the Legislature could have directed the Commission to apply the same requirement to ESPs but chose not to do so, it is reasonable to conclude that the Legislature concluded it was not necessary or appropriate to require ESPs submit their contracts to the Commission for pre-approval under the EPS."¹²

¹⁰ Report at 76.

¹¹ *Id.* at 77.

¹² *Id.*

The Joint Commenters encourage the Commission to follow the Report's lead and pursue the implementation of a consistent GHG standard for all load-serving entities while recognizing the proper limits of its jurisdiction.

Conclusion

The POUs represented by these Joint Comments support the implementation by the proper regulatory authority, of greenhouse gas emission reduction standards for load-serving entities and publicly owned electric utilities that are consistent with the state's reduction goals.

Dated: October 18, 2006

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the attached:

**JOINT COMMENTS OF THE
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POWER AGENCY, AND THE SOUTHERN CALIFORNIA PUBLIC POWER
AUTHORITY ON THE INTERIM EMISSIONS PERFORMANCE
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on all known parties to R.06-04-009 by transmitting an e-mail message with the document attached to each party named in the official service list. I served a copy of the document on those without e-mail addresses by mailing the document by first-class mail addressed as follows:

See attached service list

Executed this 18th day of October 2006, at Sacramento, California.

A handwritten signature in black ink, appearing to read "Vicki Ferguson", written over a horizontal line.

Vicki Ferguson

Service List R.06-04-009, updated October 17, 2006

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